

**EXHIBIT A: Form of Stipulated Motion To Dismiss With Prejudice****IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

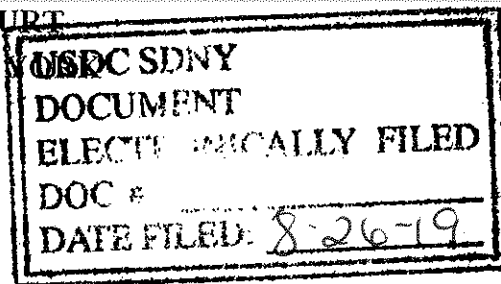
JONATHAN BERALL, M.D., M.P.H.,

Plaintiff,

v.

VERATHON INC., PENTAX OF AMERICAN,  
INC., KARL STORZ ENDOSCOPY-AMERICA,  
INC., AIRCRAFT MEDICAL, LTD., LMA  
NORTH AMERICAN, INC., AND AIRTRAQ,  
INC.,

Defendants.



Case No. 1:10-cv-05777-LAP-DCF

The Clerk of the Court shall  
mark this action closed and all  
pending motions denied as moot.

SO ORDERED:

*Loretta A. Preska*  
LORETTA A. PRESKA, U.S.D.J.

8/26/19

**STIPULATED MOTION TO DISMISS WITH PREJUDICE**

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the terms of a separate Settlement Agreement, Plaintiff, Jonathan Berall and Defendant, Aircraft Medical Ltd., have agreed to settle, adjust and compromise all claims and counterclaims in the above-captioned action as between Plaintiff and Aircraft Medical Ltd. Plaintiff and Aircraft Medical Ltd., therefore, move this Court to dismiss the above-entitled cause and all claims and counterclaims as between Plaintiff and Aircraft Medical Ltd. made therein with prejudice to the re-filing of same. Each party shall bear its own costs.

*Jonathan Berall*  
9 August, 2019

*M. Sooter* 8/23/19  
Mary (Mindy) V. Sooter  
Nora Q.E. Passamaneck  
Wilmer Cutler Pickering Hale and Dorr LLP  
1225 17th Street, Suite 2600  
Denver, CO 80202  
(720) 274-3135  
mindy.sooter@wilmerhale.com  
nora.passamaneck@wilmerhale.com  
Counsel for Aircraft Medical, Ltd.